

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**EMPIRE HOLDINGS GROUP LLC
d/b/a ECOMMERCE EMPIRE
BUILDERS d/b/a STOREFUNNELS.
NET and PETER PRUSINOWSKI,**

Defendants.

Case No.

**NOTICE OF FILING OF COMPLAINT AND
STIPULATED PRELIMINARY INJUNCTION
PURSUANT TO 28 U.S.C. § 754**

By and Order of the United States District Court for the Eastern District of Pennsylvania, in the matter captioned *FTC v. Empire Holdings Group LLC. et al.*, No. 2:24-cv-04949-WB (E.D. Pa.), entered on November 8, 2024, I, Kevin Dooley Kent, was appointed the receiver (the “Receiver”) of all assets and properties of Empire Holdings Group LLC, Star Active Sports LLC, Empire Partner Network LLC, Atlas Fund Limited Partnership, Atlas Fund Trust, and Atlas Fund Land Trust. Pursuant to 28 U.S.C. § 754, the Receiver hereby files copies of (a) the Complaint filed on September 18, 2024 (excluding attachments pertaining to the *Ex Parte* Motion for a Temporary Restraining Order) and (b) the November 8, 2024 Stipulated Preliminary Injunction attached hereto as Exhibits “A” and “B,” respectively, for the

purpose of vesting the Receiver with jurisdiction and control over all such property located within this District, with the right to take possession thereof.

Respectfully Submitted,

Dated: November 12, 2024



Kevin Dooley Kent

Kevin Dooley Kent, Receiver

Pro se